

REMARKS

The Examiner is thanked for the performance of a thorough search. Claims 1 and 49 have been amended. Claims 3 and 11 have been canceled. No claims have been added or withdrawn. Therefore, Claims 1-2, 4-10 and 12-50 are pending in the application.

The amendments to the claims herein do not raise any new issues. Claims 1 and 49 have been amended by incorporating the limitations of former Claim 3. Thus, the scope of present Claim 1 is the same as former Claim 3 for which a search and examination have already been conducted. Further, Claim 49 contains features similar to those recited in Claim 1 including the limitations of former Claim 3. Since a new search and examination is not required, the amendments herein should be entered.

Each issued raised in the Office Action is addressed hereinafter.

I. ISSUES RELATED TO THE PRIOR ART

A. CLAIMS 1-2, 4-50 – 35 U.S.C. § 102(e) – FLETCHER

Claims 1-2 and 4-50 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by *Fletcher* (U.S. Pat. Pub. 2007/0233871). The rejection is respectfully traversed.

To anticipate a claim, the cited reference must teach each and every element of the claim. MPEP § 2131. As explained hereinafter, each pending claim recites at least one limitation that is not disclosed, taught, or suggested by *Fletcher*.

CLAIMS 17 AND 50

Claim 17 features, among other things:

“receiving at a web services broker, from a source, **a request** for information, **wherein said request includes an identification of a particular instance of said source;**

wherein the source is a client application, separate from the web services broker, that does not have logic for directly interacting with a particular web service;

in response to receiving said request, **based on said identification of said particular instance of said source, the web services broker accessing transformation information;**

...

wherein said transformation information includes a mapping between said identification of said particular instance of said source and an identification of said particular web service from which said particular instance wants said requested information”. (Emphasis added.)

Thus, Claim 17 features **a request** for information from a client application **that includes identification of the particular instance of the source. Based on the identification of the particular instance, the broker identifies the client application’s web service preferences.** In response to receiving the request, the broker **accesses transformation information that includes a mapping between the particular instance of the client application and a particular web service from which the particular instance wants the requested information.** Based on the transformation information, the data from the client application is transformed to the proper data and format requirements of the particular web service, and passed to the particular web service according to access style and encoding requirements of the particular web service.

The Office Action contends that *Fletcher* discloses the data transformation based on identification of the requesting client application as featured in Claim 17. This is incorrect for at least three reasons. First, *Fletcher* does not teach or suggest a request from a client application that includes identification of the particular instance of the client application. Second, *Fletcher* does not teach or suggest accessing transformation information based on an identification of a client application provided in the request from the client application. Third, *Fletcher* does not

teach or suggest transformation information that includes a mapping between the identification of the client application and a particular web service.

With respect to the first reason that *Fletcher* fails to disclose data transformation based on identification of the requesting client application, the Office Action suggests that *Fletcher* at paragraphs 10, 23, and 46 teaches “a request for information where said request includes an identification of a particular instance of said source”. However, this is not the case. Rather, paragraph 10 of *Fletcher* merely enumerates a core set of standards that comprise web services. This paragraph says nothing about requests from client applications. Paragraph 23 of *Fletcher* discloses a technique for establishing 2-way communications between the portal platform and a portlet proxy. This technique is explained in detail by paragraphs 92 and 93 of *Fletcher*. (*see also Fletcher*, figure 17). To establish the 2-way communications, the portal platform provides an identifier to the portlet proxy through the portlet proxy’s system interface. (*see Fletcher*, para. 93 stating “the (previously-registered) portal platform programmatically provides its URN to the portlet proxy (for example, by invoking a “setURN” method of the portlet proxy).”) The portal platform of *Fletcher* is not a client application as featured in Claim 17. Further, nowhere in *Fletcher* is transformation information accessed based on the URN provided to the portlet proxy by the portal platform. Finally, paragraph 46 discloses requests from client applications to web service proxies but says nothing about including an identification of the client application in the requests. Consequently, *Fletcher* does not teach or suggest “a request for information, wherein said request includes an identification of a particular instance of said source”.

With respect to the second reason that *Fletcher* fails to disclose data transformation based on identification of the requesting client application, the Office Action alleges that *Fletcher*’s data mapping disclosed in paragraph 72 teaches accessing transformation information based on identification of a requesting client application. However, the transformation information that

provides the data mapping of *Fletcher* is accessed based on the operation with which it is associated, and not on the identity of the client application. The association between transformation information and an operation is provided by a composer (i.e., a portlet proxy developer) prior to the deployment of the portlet proxy in the portal platform. (*see Fletcher*, para. 72 stating “a **composer** may also provide a data mapping between an exposed operation and an internal service port type operation”.) Nowhere in *Fletcher* is it suggested that transformation information is accessed based on the identification of the requesting client application in response to a request from the client application. Thus, *Fletcher* does not teach or suggest “in response to receiving said request, based on said identification of said particular instance of said source, the web services broker accessing transformation information”.

With respect to the third reason that *Fletcher* fails to disclose data transformation based on identification of the requesting client application, the Office Action contends that *Fletcher* at paragraph 72 teaches transformation information that includes a mapping between the identification of a client application and an identification of a particular web service. However, as discussed above, the transformation information of *Fletcher* is established by a composer of a portlet proxy and is a mapping between the output parameters of one function to the input parameters of another function. Nowhere in *Fletcher* is it disclosed or suggested that the transformation information is accessed based on the identity of the client application and that the transformation information includes a mapping between the identity of the client application and the identity of a particular web service. Thus, *Fletcher* does not teach or suggest “wherein said transformation information includes a mapping between said identification of said particular instance of said source and an identification of said particular web service from which said particular instance wants said requested information”.

For at least the foregoing three reasons, Claim 17 is patentable over the art of record. Reconsideration and withdrawal of the rejection of Claim 17 is respectfully requested.

Claim 50 contains features similar to those recited in Claim 17 which is deemed to be in condition for allowance. Therefore, Claim 50 is allowable for at least those reasons given with respect to Claim 17. Reconsideration and withdrawal of the rejection with respect to Claim 50 is respectfully requested.

CLAIM 1 AND 49

Claim 1 features, among other things, “wherein said transformation information specifies how to transform a plurality of first data each from a respective source of a plurality of sources, to a plurality of second data each for a respective web service of a plurality of web services”.

Thus, Claim 1 is about “many-to-many” brokering. Specifically, Claim 1 expressly requires transformation information that specifies how to transform data (a) from each of many sources (b) to each of many web services. Having this many-to-many transformation information allows the web services broker to select the specific transformation to perform in any given situation based both on the type of the source and the type of the web service that is being invoked by the source. Thus, **a single instance** of a web services broker can broker “many-to-many” transactions and types of transactions between applications and web services.

In contrast, *Fletcher* is about “one-to-many” mapping. In *Fletcher*, a single instance of a portlet proxy can transform the input parameter values to a public interface of the portlet proxy to one of many target software resources. See *Fletcher*, paragraph 74; figure 11. Thus, the transformation information in *Fletcher* specifies how to transform data from one source (i.e., input parameters to the public interface) to one of a plurality of web services. However, *Fletcher* does not teach or suggest transformation information that specifies how to transform data from a plurality of sources to data for use with a plurality of web services. Consequently, *Fletcher* does

not teach or suggest “wherein said transformation information specifies how to transform a plurality of first data each from a respective source of a plurality of sources, to a plurality of second data each for a respective web service of a plurality of web services”.

For at least the foregoing reasons, Claim 1 is patentable over the art of record. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

Claim 49 contains features similar to those recited in Claim 1 which is deemed to be in condition for allowance. Therefore, Claim 49 is allowable for at least those reasons given with respect to Claim 1. Reconsideration and withdrawal of the rejection with respect to Claim 49 is respectfully requested.

B. REMAINING CLAIMS

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each dependant claim includes the features of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable. Removal of the rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested. In addition, the dependent claims introduce additional features that independently render them patentable. Due to the fundamental differences already identified, a separate discussion of those features is not included at this time.

II. CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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